

CITY OF FRANKLIN, TENNESSEE

# Analysis of Impediments to Fair Housing Choice

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1/03/13

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ANALYSIS OF IMPEDIMENTS TO  
**FAIR HOUSING CHOICE**  
**CITY OF FRANKLIN, TENNESSEE**

**I. INTRODUCTION AND EXECUTIVE SUMMARY**

The City of Franklin is updating its Analysis of Impediments (AI) to Fair Housing Choice. An “impediment” to fair housing choice is defined as actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict housing choices or the availability of housing choice or any actions, omissions, or decisions that have this effect. The City understands the importance of having an AI in place, including:

- The City realizes the importance of having housing choice for its residents and consequently the importance of removing impediments to housing retention, development and use by all citizens;
- The City has in place a Fair Housing Committee that understands the connection between affirmatively furthering fair housing choice and promoting affordable/workforce housing;
- The City was awarded Community Development Block Grant (CDBG) entitlement status by the U.S. Department of Housing and Urban Development.

An “impediment” to fair housing choice is defined as actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict housing choices or the availability of housing choice or any actions, omissions, or decisions that have this effect.

Our City must be poised to meet the challenges of changing demographics in the current economy. Ensuring access to housing choices and opportunities for housing for all City residents will continue to be addressed. The City of Franklin, Tennessee administers a variety of U.S. Department of Housing and Urban Development (HUD) funds that include the requirement to “affirmatively further fair housing.” This requirement goes beyond merely making discrimination illegal, it includes an action-oriented approach to eliminating housing discrimination.

**Procedures for Mapping Analysis of Impediments.** Input from residents, public and private service providers and citizens knowledgeable of the community contributed significantly to other data sources for identification of the Impediments to Fair Housing Choice and the actions designed to address those Impediments.

Impediments identified and addressed by actions in the AI are as follows:

**LACK OF AFFORDABLE HOUSING CHOICE**

**LACK OF AWARENESS AND UNDERSTANDING OF FAIR HOUSING LAWS**

**LACK OF OUTREACH AND EDUCATION TO THE COMMUNITY CONCERNING FAIR HOUSING**

**LACK OF A PLAN AND FORMAL PROCESS FOR ADDRESSING FAIR HOUSING ISSUES ON AN ONGOING BASIS**

A summary of the analysis considered in determining the Impediments, as well as Twenty-one (21) specific actions developed to address each of the above Impediments, are discussed in detail in Section IV of this document.

As this document is a revised version, previously identified actions to address impediments have been successfully implemented prior to this current revision of the AI.

**Actions Implemented and Discussed in More Detail in Section V:**

- Fair Housing Choice Ordinance
- Barrier Free Construction Ordinance
- Affordable and Workforce Housing Round-up Ordinance & Program
- Continue CDBG Allocation for Fair Housing Training
- Second Annual Housing Fair
- Foreclosure Task Force
- TNHousingSearch.org
- City Staff Training & Conference Participation
- Uniform Residential Landlord and Tenant Act Training
- Community Workshops including one that was non-English
- Staff is Home Buyer Certified

The Analysis of Impediments and the Consolidated Planning actions and goals will be worked in concert with the objective to continually improve the effectiveness of our collective efforts in the community to Affirmatively Further Fair Housing Choice.

## II. JURISDICTIONAL BACKGROUND DATA

### Population Overview

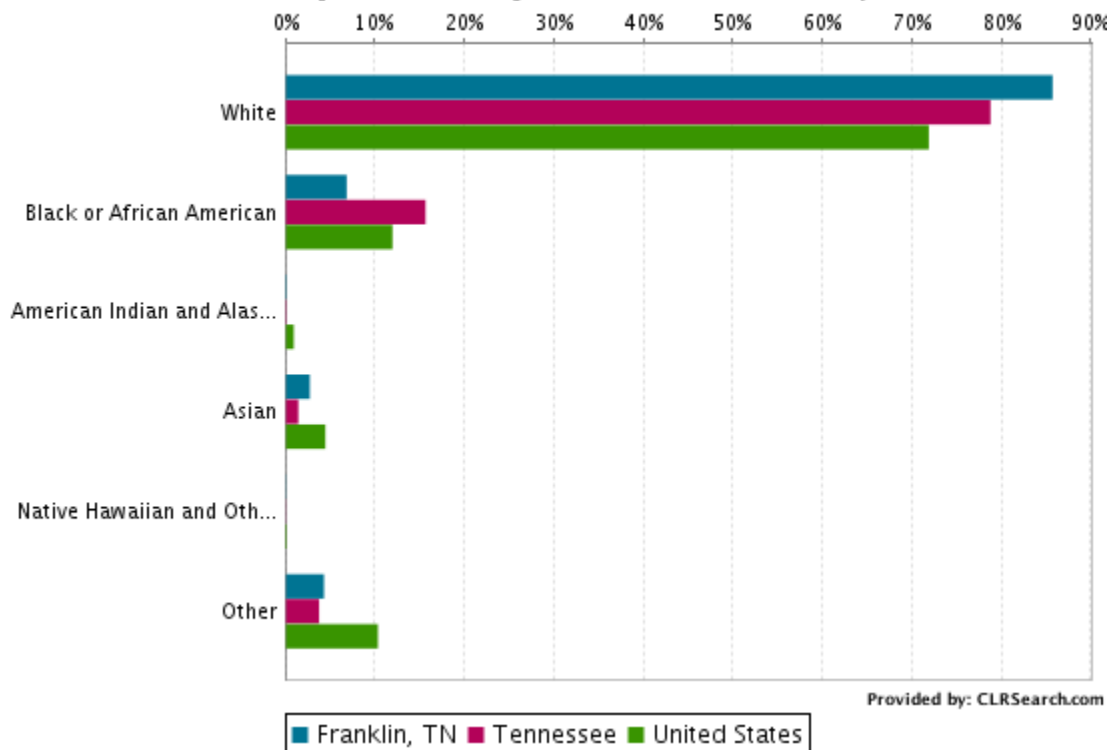
#### Population

Franklin's 2010 population was 62,487 persons, with a projected population of 79,028 persons in 2016, according to the U.S. Census Bureau. The 2010 Census showed 28% of the residents are under the age of 18 and 10% are 65 years of age or older. Over 80% of the residents are non-Hispanic white, just under 7% are non-Hispanic Black/African American, nearly 8% are Hispanic/Latino, and a smaller number of persons are Asian or multiracial. Nearly 10% of the population is foreign-born with 65% of foreign-born persons arriving since 2000. In 2000 there were 23,757 households with an average size of 2.5 persons.

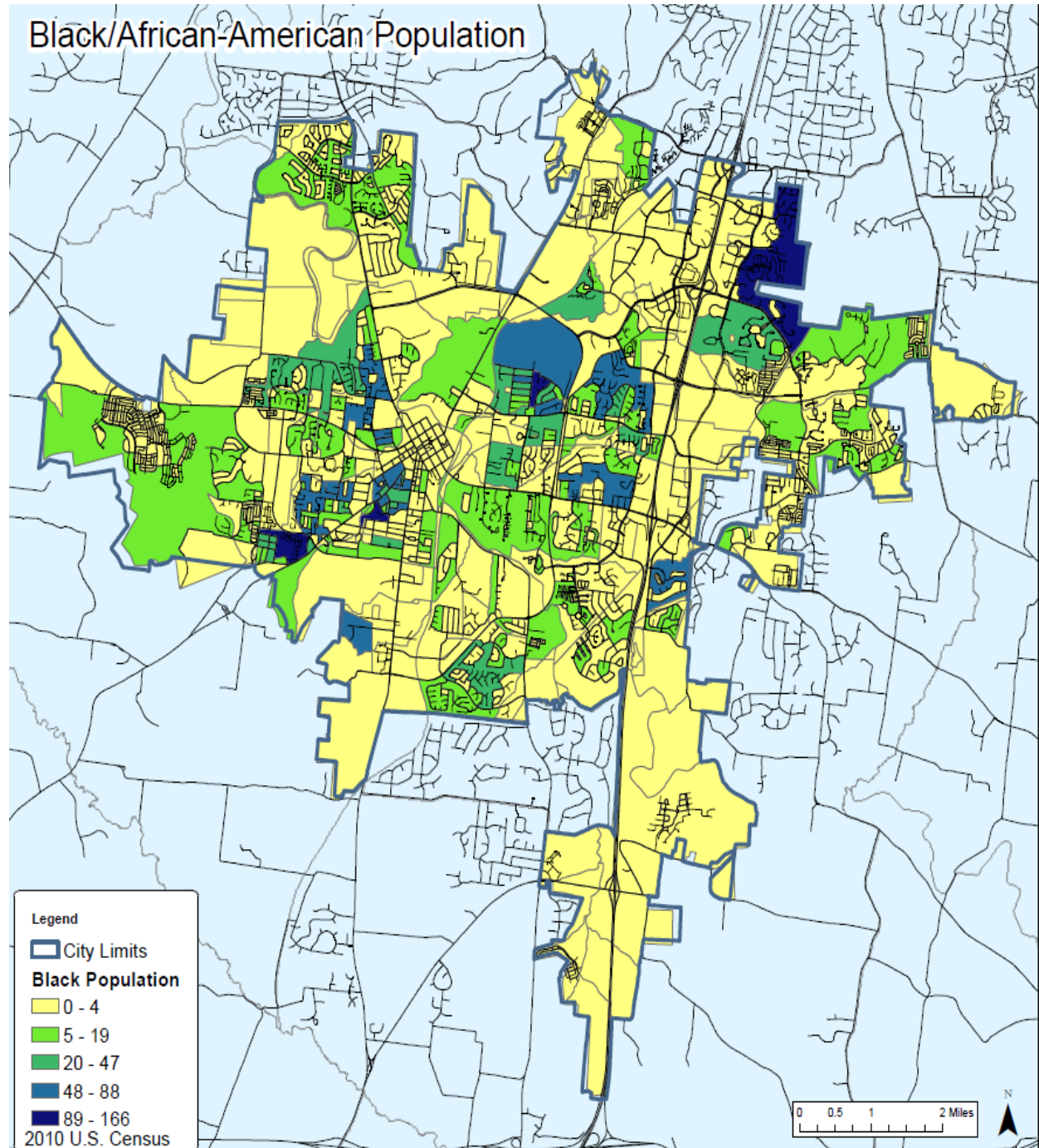
#### Income and Education

The median 2010 household income was \$73,908. Although relatively high, 7.4% of the populations have incomes at or below the poverty rate and the unemployment rate is 6.4%, indicating persons and areas to be targeted with Community Development Block Grant funds. For persons 25 years of age or older, about 6% have no high school diploma or GED. Fifty percent (50%) of the population hold bachelors or graduate/professional degrees.

**2010 Population by Race for Franklin, TN**

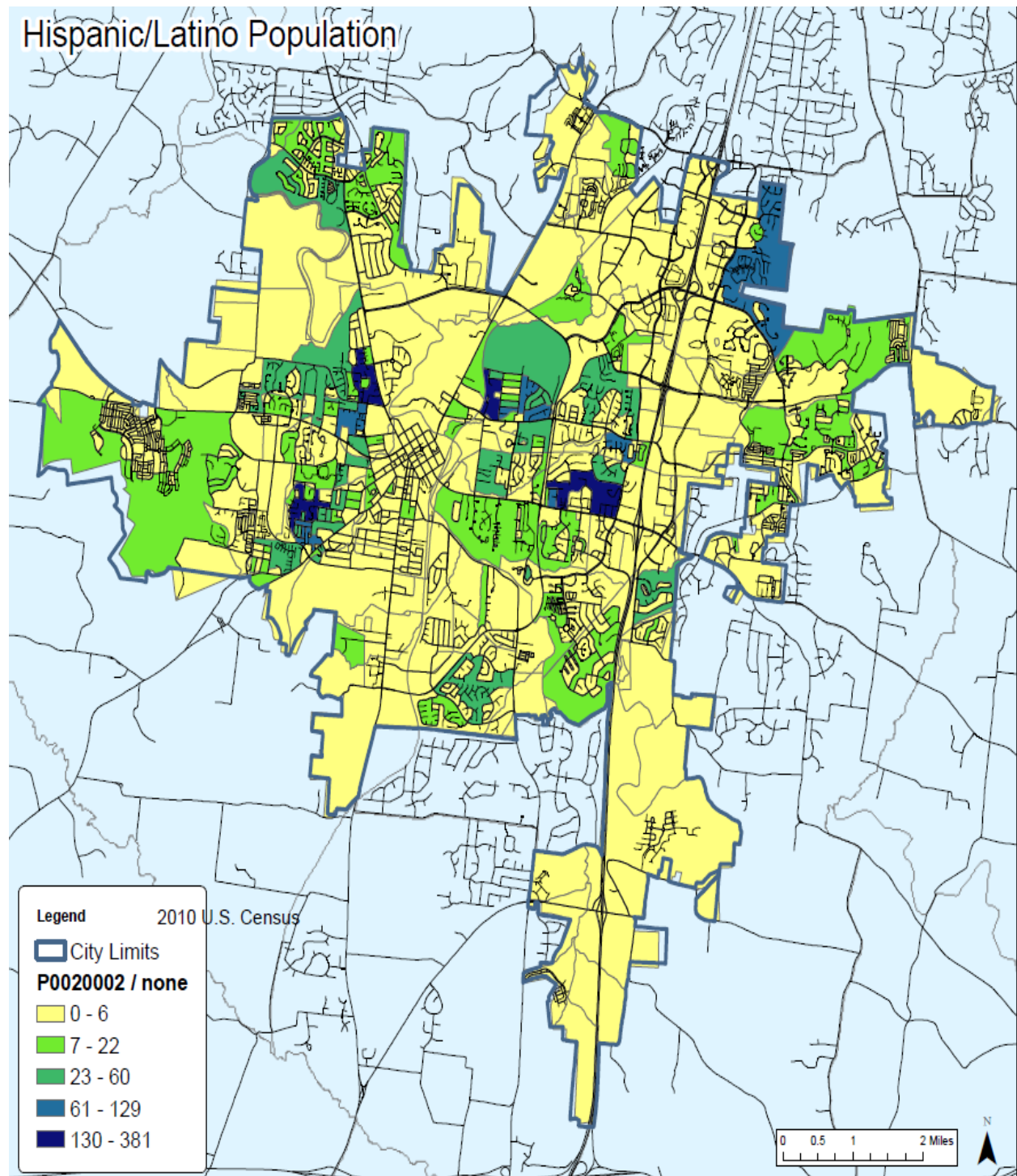


The chart above illustrates non-Hispanic race/ethnicity by percentage for the population of Franklin in 2010. In addition, 4.9% of the population identified as Hispanic/Latino, 1.3% as non-Hispanic multiracial, and 0.2% as non-Hispanic other race. The following maps show the geographic dispersion by U.S. Census Tract of the Black/African American and Hispanic/Latino populations.



**Black/African American Population** 2010 U.S. Census



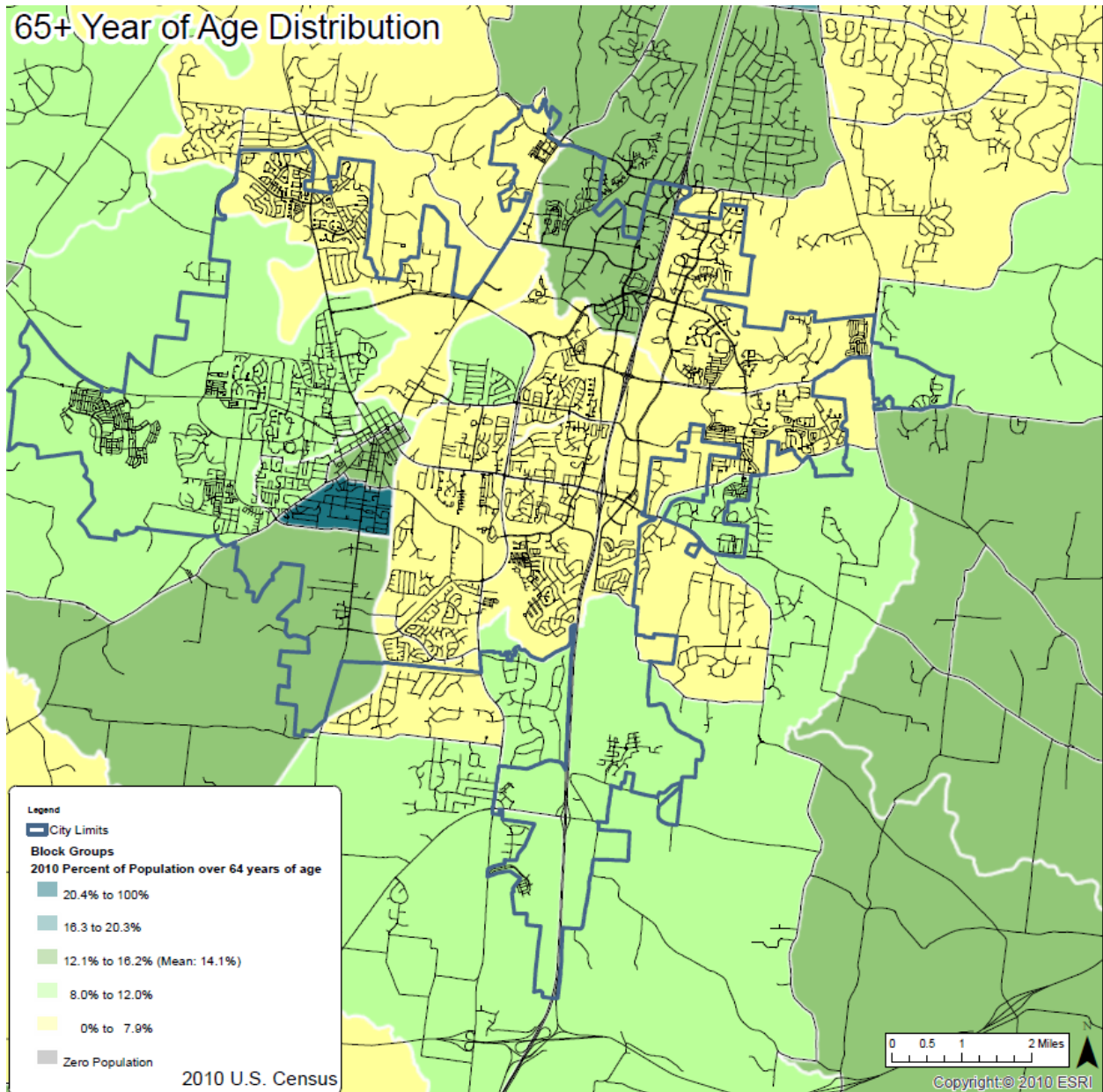


Hispanic or Latino Origin 2010 U.S. Census



## Age

The median age in Franklin is 41.3 years, just slightly older than the median age of 37.1 years for the U.S. population in 2012. The median age for males is 35.8 years and 38.5 for females. Approximately 8% of the population is age 65 years old and over and 28.2% are under 18 years old. Nearly one-third of the married-couple households have children under the age of 18, while only 7.5% of the single-parented households are with children. The following map shows the geographic dispersion by census tract of persons 65+ years of age.



**65+ Year of Age** 2010 U.S. Census

## Disability

An estimated 4,787 persons (2000 U.S. Census Sample Data Set) in Franklin are disabled, representing 12.8% of the City's population. Nearly 45% of the disabled have multiple disabling conditions. Females account for approximately 54% of the disabled and males for the remaining 46%. The table below shows disability status by age by major disability types.

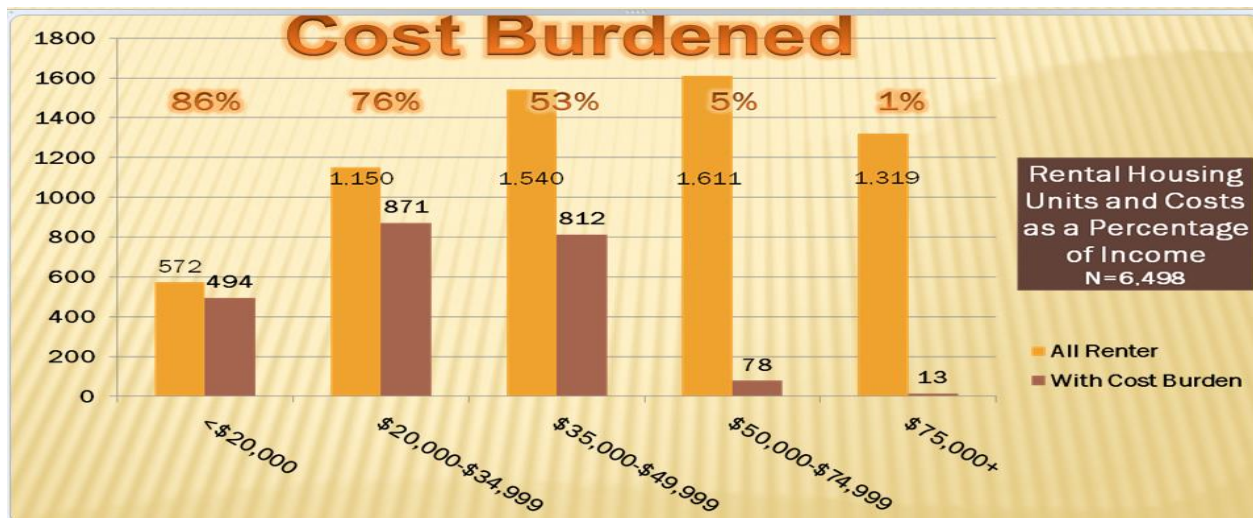
Persons With Disability By Age And Type Of Disability								
Age/Type	Single Disability	Sensory Disability	Physical Disability	Mental Disability	Self-Care Disability	Go-Out Disability	Employ. Disability	Multiple Disabilities
5-15	296	30	0	245	21	NA	NA	27
16-20	204	7	15	80	0	5	97	138
21-64	1,610	149	272	164	8	73	844	1,177
65+	531	56	320	43	0	112	NA	804
TOTAL	2,641	242	607	532	29	190	941	2,146

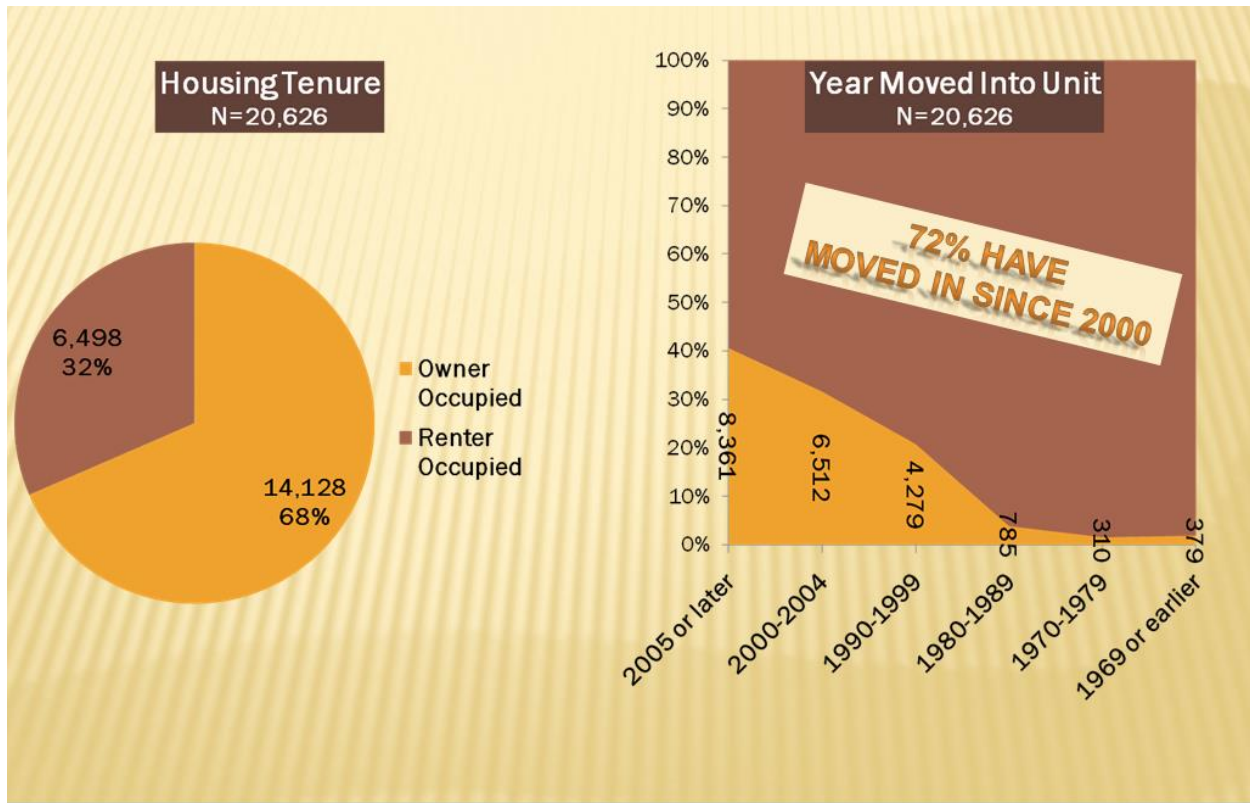
## Population Diversity by Income, Employment, and Poverty

### Income

In 2000, the median household income in the City of Franklin was \$56,431. By 2010, Williamson County, in which Franklin is located, estimated the median household income for the City at \$91,358. According to 2000 U.S. Census data, nearly 4,500 Franklin households were either extremely low income, low income, or moderate income. Generally speaking, households at these income levels qualify for some type of federal housing assistance. Extremely low income is defined as households with 0 to 30% median family incomes; low income is defined as 31 to 50% median family income; moderate income is defined as 51 to 80% median family income.

The following chart is based on from the 2011/2012 City of Franklin, Consolidated Plan. The table reflects some of the causes of housing problems including: 1) substandard housing condition; 2) overcrowding; or 3) cost burden, indicating the household is paying more than 30% of their income toward housing costs.

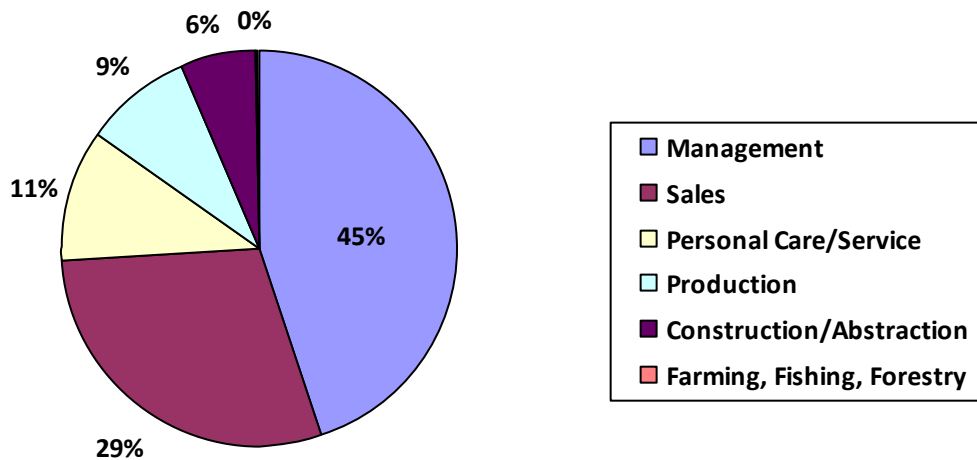




### Employment

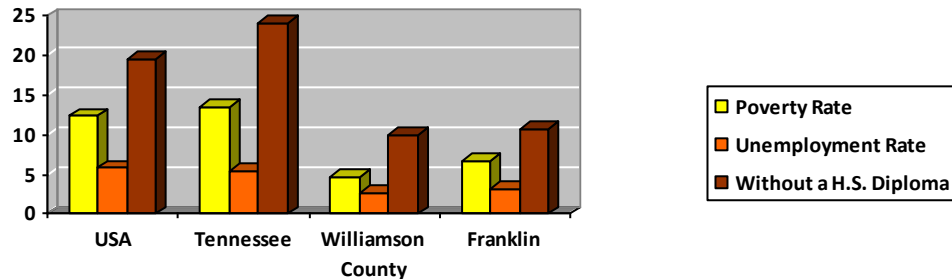
In 2000, the percentage of population in Franklin 16 years old and over who were employed was 71.9%. The unemployment rate at that time was 3.2%. Over 40% of the households reported interest, dividends, or rental income for the year 2000; less than 2% reported public assistance income. The chart below reflects the most current information available from the Census Bureau.

### OCCUPATION EMPLOYMENT Source: 2000 Census



### Poverty

Although Williamson County, has the designation of being the wealthiest place in the State, pockets of poverty do exist in the City and their needs are prevalent.



### POVERTY RATE *Source: 2000 Census*

The three indicators in the above chart illustrate that data related to poverty are quite similar in Williamson County and the City of Franklin, and show that both jurisdictions have proportionally fewer residents living in poverty and/or without a high school diploma or GED, and fewer persons aged 25 or older who are unemployed. U.S. Census data also shows that at the time of the last decennial census, only 1.6% of Franklin households, 257 households, were receiving public assistance income.

The table below shows poverty among the elderly and children, and for African-American and Hispanic or Latino persons. This table begins to point to subpopulations in Williamson County and the City of Franklin where anti-poverty strategies and initiatives are most warranted. The elderly have a poverty rate in Franklin (12%) nearly double the overall poverty rate (6.7%) and noticeably above the percentage of total elderly persons living in the City (7.5%). The percentage of elderly persons in poverty in Franklin also exceeds the percentage in the country at large. This reinforces earlier data presented showing significant housing cost burdens borne by the elderly.

Persons	Poverty Rate			
	USA	Tennessee	Williamson County	City of Franklin
<b>Total</b>	12.4	13.5	4.7	6.7
<b>Elderly</b>	9.9	13.5	8.9	12.0
<b>Children</b>	16.6	18.0	5.6	8.0
<b>African American</b>	24.9	25.3	12.9	17.8
<b>Hispanic or Latino</b>	22.6	23.3	15.0	17.1

The African-American and Hispanic percentages in the above table represent over 1,000 persons in the City of Franklin. Although better than the percentages for the country at large, the relatively high percentages within the City point to a need for anti-poverty strategies targeting these minority groups.

## Housing Overview

### Housing Profile

In 2010 there were 21,691 housing units, with a homeownership rate of 63.5%. Nearly 63% of the housing units are single-family detached homes. Housing structures in Franklin had a median age of less than 10 years in 2000, reflecting the robust growth being experienced by the City. The median value of owner-occupied housing was \$205,000 and the median gross rent for a one bedroom was \$1007.

### Supply of Housing

According to the 2000 Census, Franklin has 17,214 housing units. The overall vacancy rate is 6.5%, with a rental vacancy rate of 7.1% and homeowner vacancy rate of 4%. The table below shows much of this information in comparison to Williamson County and Tennessee.

Housing Overview			
Housing Characteristic	Tennessee	Williamson County	City of Franklin
<b>Total Housing Units</b>	2,439,443	47,005	17,214
<b>Overall Vacancy Rate</b>	8.5%	4.9%	6.5%
<b>Single-Family Detached Units</b>	67.3%	78.7%	59.2%

In 2009 there were 362 new single-family privately-owned housing units authorized by permit in Franklin. These units represented 100% of the building permits for new privately-owned housing units. 2009 data show no permits were issued for new privately-owned multifamily housing units or for new privately owned housing units in structures with two or more units. The table below shows the percentage of housing units by number of units in a structure.

Percentage Of Housing By Unit Type			
Housing Type	Tennessee	Williamson County	City of Franklin
<b>Single-Family Detached</b>	67.3	78.7	59.2
<b>Single-Family Attached</b>	2.8	4	5.8
<b>Structures with 2-4 Units</b>	6.8	3	6.2
<b>Structures with 5-9 Units</b>	4.4	3.9	9.8
<b>Structures with 10-19 Units</b>	3.1	3.5	9.1
<b>Structures with 20+ Units</b>	4.3	2.8	7.4
<b>Mobile Homes, Trailers, Other</b>	11.2	4.1	2.5

### Demand of Housing

Franklin is home to 16,092 households with an average household size of 2.5. Household composition is evenly split between married couples with children under 18 (32.1%), family households without children under 18 (30.2%), and non-family households (30.2%). Only 7.5% of households are single-parent headed with children under 18. Seven and one-half percent (7.5%) of the population of Franklin are aged 65 or older and 28.2 percent are aged 18 or younger.

The table below shows housing hardship by income strata, a more general view than discussed in the previous section. Notably, Franklin exceeds the cost burdens for both Tennessee and Williamson County. The incidence of overcrowding is small.



Percentage Of Households With A Housing Hardship			
Type of Hardship	Tennessee	Williamson County	City of Franklin
Pct. HHs with incomes 0-80% of area median and >30% Cost Burden	47.1	54.9	61.7
Pct. HHs with incomes 0-80% of area median and >50% Cost Burden	23.3	29.4	32.1
Pct. Housing units that are overcrowded	2.7	1.4	2.5

Median household income in 2010 was \$93,935 and unemployment was at a low rate of 6.4%. Less than 7% of households have incomes at or below the poverty rate. The poverty rate for children is 8% and for the elderly 12%. The median income of borrowers for owner-occupied housing in 2005 was \$84,000. Only 14.8 percent of those purchases were by lower income borrowers, who represent 28% of the total household population.

#### Condition of Housing

The median year a housing structure was built in Franklin is 1992. Comparing this to 1975 for the State of Tennessee and 1987 for Williamson County illustrates Franklin's attraction for new residential construction. Approximately three-quarters of Franklin's housing units have been constructed since 1979. Nearly one-half have been constructed since 1990. 2000 U.S. Census data shows that only 37 of the 17,214 housing units in Franklin lacked complete plumbing facilities, and only 171 lacked complete kitchen facilities.

#### Cost of Housing

The 2010 median gross rent for a one bedroom in Franklin was \$1007. The median value of affordable owner-occupied housing units was \$205,000, and a workforce average of \$385,000. With a median household income of \$56,000, the median rent of \$758 is not an affordability mismatch, assuming the standard of 30% of income for housing costs; although, data presented earlier shows over 2500 renters with some type of housing problem, mostly cost burdens. However, the typical Franklin home for purchase is becoming unaffordable to the typical Franklin household. The dream, security, and wealth building of homeownership are extra difficult for Franklin households with incomes less than 80% of the median income.

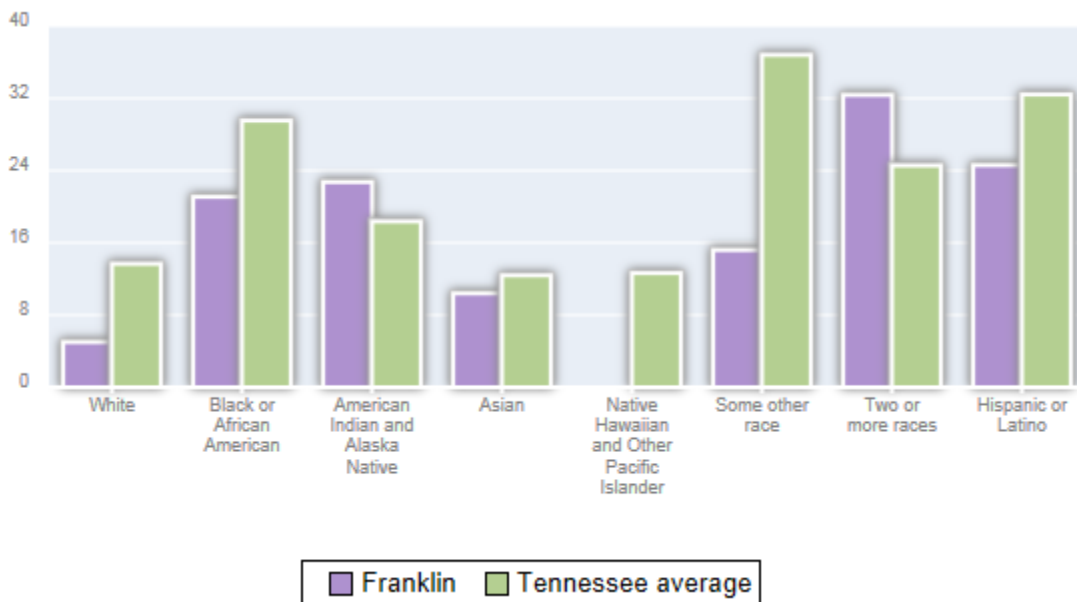
Cost Of Housing			
Cost	Tennessee	Williamson County	City of Franklin
Median Gross Rent	\$532	\$889	\$1007
Median Value of Owner-Occupied Units	\$93,000	\$208,400	\$184,500
Median Loan Amount for Purchase (2005)	\$100,000	\$190,000	\$176,000

### Homeownership and Rental Rates and Disproportional Housing Needs

Sixty three (63%) of Franklin's housing units are owner-occupied. The homeownership rate for households with incomes between 0 and 80% of the median family income is 42.9%, significantly below that for both Williamson County and Tennessee.

Housing Tenure	Percentage of Owner-Occupied Housing		
	Tennessee	Williamson County	City of Franklin
<b>Homeownership Rate for All HHs</b>	69.9%	81.5%	63.5%
<b>Homeownership Rate for 0-80% MFI HHs</b>	54.3%	62.5%	42.9%

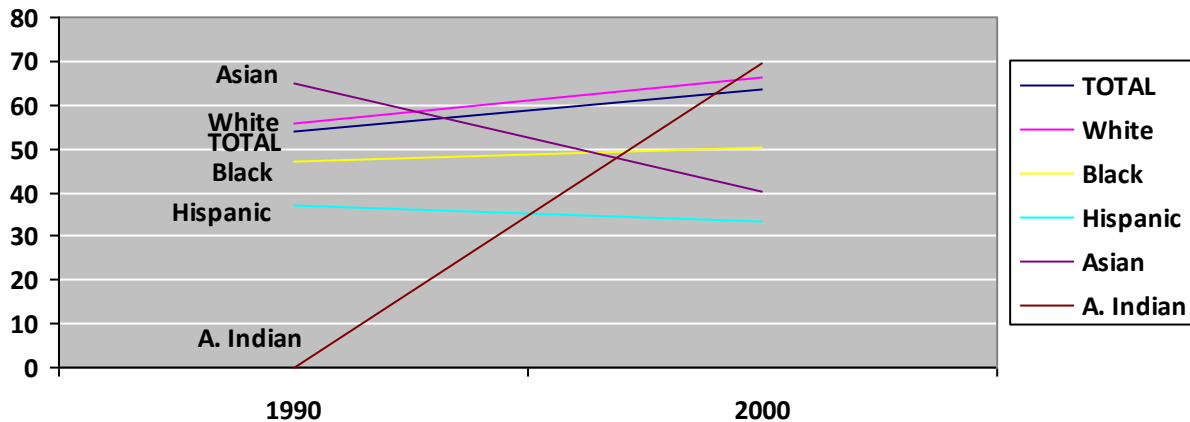
The following chart includes a breakdown by race of residents with an income below poverty level in the City of Franklin, as well as, the percentage of households in that race is the relative percentage of households in that race.



Non-hispanic whites represent over 80% of the population of Franklin and have a homeownership rate of 66.5%. No racial/ethnic group has a homeownership rate that exceeds that for the State of Tennessee.



The chart below compares homeownership rates for racial/ethnic groups between 1990 and 2000. Only two groups experienced declines from 1990 to 2000; Hispanics had a decline of less than 5% and Asians had a decline of 25%. The latter decline bears further study and could partly be the result in a change in the composition of the Asian population. The volatility of the housing market since 2000 has very likely resulted in changes to these trends.



**HOMEOWNERSHIP RATES BY RACE 1990 AND 2000**

The following chart examines disproportional housing needs by race/ethnicity and tenure. Disproportionate greater need is defined as instances where the housing problems of a particular category of race and tenure exceed that for the housing problems of all households by 10% or more. For example, the table shows that Hispanic renter households have a disproportionate need of 30.7%, or in other words, they are 30.7% more likely to have a housing problem than all households combined. Housing problem, as described earlier, is defined as substandard unit, overcrowding, or a cost burden.

The table shows that two populations have a disproportionately higher percentage of housing problems: Hispanic renters and Native American owner-occupants. A closer examination of the data for Hispanic renters shows that there is a total of 311 Hispanic renter households in Franklin, 182 of which have low to moderate incomes, including 133 households with incomes less than or equal to 50% of the median family income (MFI). None of the households affected are elderly headed, almost all are family

Households with Any Housing Problem by Race and Tenure (2000)			
RACE	Renter Occupied	Owner-Occupied	Total
White	34.8%	21.2%	25.7%
African American	36.3%	22.0%	29.2%
Hispanic	<b>66.9%</b>	31.4%	<b>54.9%</b>
Native American	NA	<b>71.4%</b>	<b>71.4%</b>
Asian	15.9%	25.3%	19.8%
Pacific Islander	NA	NA	NA
All Households	36.2%	21.7%	27.0%

households with three or more members. A closer examination of the data for Native American owner-occupants shows that there are 14 households in this category. Of these 14 households, the 10

households with low to moderate incomes all have extremely low incomes, 30% or less of the MFI. The household type on these households was not available.

### **Publicly Assisted Housing Units**

The Franklin Housing Authority currently manages 253 units of public housing. The organization is authorized to manage 308 units and is in the process of building a 48 unit building for senior citizens. This building is part of a master housing plan for the area with a goal to rebuild the public housing in Franklin incorporating other housing types and income levels into the neighborhoods. Currently, there is a waiting list of 226 applicants for the existing public housing. The greatest demand is for one bedroom units with 63% of the applicants seeking this type of housing. Twenty eight percent of the applicants are seeking two bedroom units, 7%, three bedroom units and 2% four bedroom units. Rent is based on income with a minimum rental rate of \$50.

Outside of public housing units administered by the Franklin Housing Authority, there are an estimated 50 units of multi-family and Section 8 project-based assisted housing units in Franklin. There are no contracts expiring on any of these units through 2008. However, 100% of the contracts will expire in 2009-2013.

### **Mortgage Lending**

Information presented in this section is available at [www.dataplace.org](http://www.dataplace.org) and is for 2005 as reported through the Home Mortgage Disclosure Act (Federal Financial Institutions Examination Council). The Home Mortgage Disclosure Act (HMDA) requires most lending institutions to report mortgage loan applications, including the outcome of the application, information about the loan and applicant, and location of the property. The data are collected for various purposes: to assist in determining whether financial institutions are meeting the housing credit needs of their communities; to target community development funds to attract private investment to areas where needed; and to identify possible discriminatory lending patterns. The reporting requirements are based on the level of assets of the institution and the number of loans it originates in metro areas. In DataPlace, the loan-level data have been summarized for various geographic levels into indicators addressing the racial and income distribution of loans, denial rates by race and income, and loans from subprime lenders by race. For more information about HMDA data, visit the FFIEC web site at <http://www.ffiec.gov/hmda>. As a caution in interpreting this data, lending outcomes result from many factors taken into account during underwriting processes and because of individual financial circumstances should not be assumed as evidence of fair housing infractions or discriminatory practices.

For purposes of this section, “low income” is defined as 50% to 80% of area median income, “middle income” is 80% to 120% of area median income, and “high income” is 120% of area median income and above. The table below shows the percentage of owner-occupied home purchase loans to each income category.

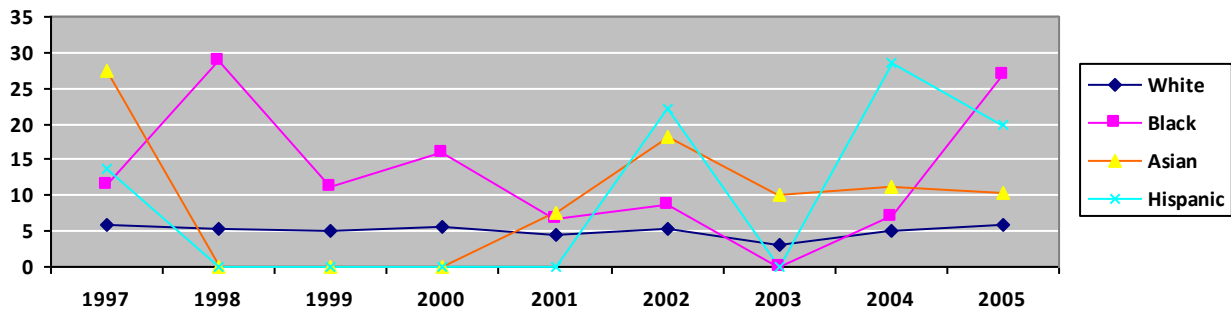
Percentage of Owner-Occupied Home Purchase Loans By Income		
Borrower	Income Range	2005
Low-income borrowers	50-80% AMI	14.8%
Middle-income borrowers	80-120% AMI	21.4%
High-income borrowers	120%+ AMI	59.8%

The table below shows the percentage of owner-occupied home purchase loans made by race, regardless of income status. Mindful of the caution expressed about interpreting HMDA data, the information below indicates that for whatever reason, African Americans and Hispanics are less likely to get a home purchase loan. Data on denial rates will further support that finding, with the same caution applying.

Percentage of Owner-Occupied Home Purchase Loans By Race					
RACE	% of 2000 Population	1997	2000	2005	Diff. btwn. 2000 Pop. and 2000 Loans
White	81.7	92.4	93.3	92.3	+11.6
Black	10.3	3.6	2.5	2.5	-7.8
Hispanics	4.9	0.9	1.1	2.3	-3.8
Asian	1.6	0.9	0.7	1.5	-1.1
Native Americans	0.1	0.2	0.1	0.1	0.0
Mixed Race Pairs	1.3	1.6	1.0	1.3	-3.3

The following graph illustrates denial rates for conventional home purchase loans by race for applicants with high incomes (120% or above area median income). Differences in denial rates among whites and minorities may be due to legitimate factors, such as differences in wealth and credit history, but a portion of the disparity is likely due to the persistence of discrimination.

#### DENIAL RATES OF CONVENTIONAL HOME PURCHASE LOANS TO HIGH-INCOME BORROWERS



The table below provides HMDA data from 2004 for conventional refinancing mortgage loans made by subprime lenders by race. During that year, 12.4% of all conventional refinancing mortgage loans were made by subprime lenders. As another note of caution in interpreting the data, subprime lenders are defined as lenders designated by the U.S. Department of Housing and Urban Development (HUD) as specializing in the subprime market, but which may also do prime lending. Designations are based on industry trade publications and Home Mortgage Disclosure Act data analyses. HUD also receives referrals from other government agencies and from consumer advocacy groups. After compiling a list of potential subprime lenders, HUD calls them or reviews their web pages to determine if they specialize in subprime lending. In cases where lenders offer both prime and subprime loans, HUD identifies lenders as subprime lenders if they report that at least 50 percent of their conventional originations are subprime loans.

Percentage of Conventional Home Refinancing Loans by Subprime Lenders	
Race	Percentage
White	10.9
Black	27.0
Asian	5.6
Hispanic	12.5
Native American	33.3
Mixed Race	18.2
Other Race	24.1

### III. EVALUATION OF JURISDICTION'S CURRENT FAIR HOUSING LEGAL STATUS

The City has experienced no fair housing complaints or compliance reviews nor has a charge been issued or a finding made of discrimination. No private plaintiffs or The Department of Justice have filed a suit of Fair Housing Discrimination.

### IV. IDENTIFICATION OF IMPEDIMENTS TO FAIR HOUSING CHOICE

The identified Impediments to Fair Housing Choice are noted below. The Impediments were developed comprehensively based on consideration of a number of factors including:

- Analysis of trends in data sources which suggest further actions or investigation are appropriate
- Community input and knowledge gained from citizens, committees, and partnerships with Public and Private Service Organizations
- Areas of focus identified in the Consolidated Plan For Community and Housing Development

Analysis of trends in statistics or data helped to point out conditions which represent a potential concern to be addressed with further activity. Community input and knowledge of cultures and conditions in the neighborhoods was an important consideration in the process.

Actions to address each Impediment are detailed below. As we move forward in our efforts to Affirmatively Further Fair Housing Choice, actions will be evaluated as to their effectiveness. Some actions are short-term or near-term activities while others will be ongoing or programmatic.

#### **Impediment:**

#### **LACK OF AFFORDABLE HOUSING CHOICE**

##### **Analysis suggested the following trends or potential concerns:**

- Black/African American, Hispanic or Latino and the elderly populations tend to be concentrated near Central Franklin and neighborhood segregation is relatively high.
- Black/African American and Hispanic or Latino populations have poverty rates more than double the overall poverty rate. The poverty rate among the Elderly population exceeds the county and national rates.
- Hispanic renter households are 30.7% more likely to have a housing problem than all other households. (A housing problem is defined as substandard unit, overcrowding or a cost burden)
- Cost burden is the most frequent housing problem indicated.

### **Actions to Address Impediment**

1. Implement water bill round-up program to generate funding to offset some permit costs associated with constructing Affordable and Workforce Housing.
2. Pursue incentives through the zoning ordinance and other regulatory codes that facilitate the development of affordable, workforce, and mixed income housing.
3. Continue to focus on assisting the elderly and disabled allowing them to remain in their homes with the CDBG Emergency Demonstration Rehabilitation program.
4. Utilize The Housing Commission and the Fair Housing Committee to educate the community and leaders about the importance of meeting the city's affordability and fair housing choice needs.
5. Pursue additional funds, such as HOME, Federal Home Loan Bank, and other sources for affordable housing opportunities.
6. Encourage landlords and tenants to participate in the rental locator database maintained by THDA (THHousingSearch.org).

### **Impediment**

#### **LACK OF AWARENESS AND UNDERSTANDING OF FAIR HOUSING LAWS**

##### **Analysis suggested the following:**

- African Americans and Hispanics are less likely to get a home purchase loan.
- Denial rates for Black/African American and Hispanics with high income (120% or above area median income) appear significantly higher than for Whites.
- The percentage of conventional home refinancing loans by subprime lenders was significantly higher for Black/African American than for Whites.

### **Actions to Address Impediment**

1. Pursue public service announcements in both English and Spanish on City of Franklin Channel 10.
2. Supply all land lords and management companies with information regarding the Fair Housing Act and how to comply.
3. Attend State and area fair housing conferences; appropriate community development/housing city staff.
4. Post/link fair housing information on city web site and at libraries.

### **Impediment**

#### **LACK OF OUTREACH AND EDUCATION TO THE COMMUNITY CONCERNING FAIR HOUSING**

##### **Analysis suggested the following:**

- Due to explosive growth in the City and County, local service organizations which promote and provide fair housing education to citizens are challenged to keep pace.
- Two of Central Franklin's neighborhoods, Natchez and Hard Bargain, received focus in The Consolidated Plan for Housing and Community Development and Community Development Block Grant Programs.

### **Actions to Address Impediment**

1. Continue to allocate a portion of the CDBG funds to an entity that supports development and delivery of Fair Housing Training and Housing Counseling.
2. Assure Fair Housing information is included in home ownership training curriculum provided by HUD agencies such as GAP which is a “HUD Approved Agency” including certified counselors and conduct outreach to advocacy groups.
3. Coordinate fair housing training and service activities with the Franklin Housing Authority.
4. Participate in or sponsor fair housing activities in Middle Tennessee.
5. Require City funded agency partners to disseminate fair housing information with application and marketing packets.
6. Develop an educational campaign centered on the rights of renters.

### **Impediment**

#### **LACK OF A PLAN AND FORMAL PROCESS FOR ADDRESSING FAIR HOUSING ISSUES ON AN ONGOING BASIS**

#### **Analysis suggested the following:**

- Lack of a formal procedure for the City to respond to Fair Housing complaints
- Lack of formal process for the City to utilize local Service Partners in advising complainants
- Desire to codify the City of Franklin’s commitment to Affirmatively Further Fair Housing Choice

### **Actions to Address Impediment**

1. Draft “Fair Housing” ordinance to include:
  - Affirmatively Furthering Fair Housing Choice is ordained as a priority for the City of Franklin
  - Incorporate procedures for complaint response and referrals by and between the appropriate community and governmental organizations
2. Create a Fair Housing Committee to promote, direct, and review fair housing activities.
3. Update Analysis of Impediments study concurrently with development of the City’s Consolidated Plan.
4. Study adoption of a universal design ordinance.

## **V. ASSESSMENT OF CURRENT PUBLIC AND PRIVATE FAIR HOUSING PROGRAMS AND ACTIVITIES IN THE JURISDICTION**

### **Actions Implemented In the Current Program Year (7/1/2008 to Date)**

#### **Fair Housing Choice Ordinance**

In December 2008, the Board of Mayor and Aldermen approved the “Fair Housing Choice Ordinance” amending the City of Franklin’s Municipal Code. This ordinance declares “policies and procedures related to Fair Housing Opportunities and Choices in the City of Franklin”.

If a fair housing complaint is received, the complaint will be delivered to the Neighborhood Resources Coordinator where it is logged, reviewed and then referred to the Tennessee Fair Housing Council for assistance. Persons that feel they have been discriminated against will be referred to file a complaint on line via the HUD web site at [www.hud.gov](http://www.hud.gov) or at the Tennessee Human Rights Commission [www.tn.gov/humanrights](http://www.tn.gov/humanrights).

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Additionally, as a local HUD Certified Agent, GAP Community Development Resources will be engaged when Fair Housing complaints are received. GAP is a locally-based non-profit who also participates as a member of the Fair Housing Committee and they have HUD certified counselors on staff.

#### **Barrier Free Construction Ordinance**

In April 2009, the Board of Mayor and Aldermen approved the "Barrier Free Construction Ordinance". This ordinance defines design standards with the purpose of improving the adaptability and "visitability" of all housing constructed with funds provided by the City of Franklin.

#### **Water and Wastewater System Development and Access Fee Incentive Program Ordinance**

Additionally the City has in place a "Water and Wastewater System Development and Access Fee Incentive Program Ordinance". This Ordinance facilitates the Affordable and Workforce Housing Reserve. The funds deposited in this reserve are determined annually by the Board of Mayor and Alderman and may originate from grants, the general fund, or from funds generated from city property owners who voluntarily agree to round-up their monthly water utility bills to the next-highest dollar.

#### **Affordable and Workforce Housing Round-up Ordinance**

The Board of Mayor and Aldermen approved the "Affordable and Workforce Housing Round-up Ordinance". All monies derived from the Voluntary Roundup Fee Program are entered into the Workforce Housing Reserve to fund the Water and Wastewater System Development and Access Fee Incentive Program. In the future, the Board of Mayor and Alderman, by ordinance, may authorize the use of said donated monies to assist in the development of deed-restricted affordable housing. A snapshot from the City of Franklin's website is included below. To view the site, follow this link: <http://www.franklintn.gov/communityDev/awh.html>

## **AFFORDABLE & MODERATELY PRICED HOUSING VOLUNTARY ROUND-UP PROGRAM**



*Franklin Special School District, Hard Bargain Mount Hope Redevelopment LLC, Columbia State Community College.*

Dear Franklin Utility Bill Customer,

Please join me in supporting affordable and moderately priced housing in Franklin by rounding up your monthly utility bill to the next whole dollar.

This voluntary opt-in program will not take away from other vital city services supported by your tax dollars, but it will help a family buy a home that they might not otherwise be able to afford. I appreciate your consideration and support!



### **CDBG Allocation of \$15,530 for Fair Housing and Homeownership Training**

In response to public comments to the 2009-2010 Consolidated Plan and Annual Action Plan, as well as a recommendation from the Affordable and Workforce Housing Advisory Committee, the City of Franklin allocated \$15,530 in Community Development Block Grant (CDBG) funds for Fair Housing and Homeownership Training.

### **Second Annual Housing Fair**

In June 2009, the second annual Housing Fair was held at City Hall in Franklin. Marketing for the event was effective and public interest has improved as evidenced by attendance well above our first Housing Fair in 2008.

Further developing public and private partnerships, citizens were welcomed by a diverse group of service providers. Including but not limited to Mortgage Lenders, Community Based Development Organizations, Faith Based Organizations, Tennessee Fair Housing Council staff, City of Franklin Housing and Community Development staff, Tennessee Fair Housing Commission staff, Tennessee Housing Development Agency staff, Housing and Urban Development staff, local graduates of H.U.D. Certified Home Buyer Education Classes provided through GAP Community Development Resources and more.

Two free citizen workshops were held during the fair and received strong attendance. The first workshop included a diverse panel of experts who presented information and answered questions on topics including Foreclosure Avoidance, Fair Lending Practices & Borrowers Rights, SCAMS associated with Lending and Foreclosure, as well as the services available through their various public or private organizations.

The second workshop focused on Affordable Housing Programs, Local Housing Resources, Housing Education and other related services available to citizens in the City. Panelist presented information and answered questions on topics including Financing Options via local non-profit organizations; CDBG & CDBG-R funded activities including the Emergency Repair Program and Community Based Development Organization (CBDO) Programs. Additionally, citizens were informed of activities and invited to attend the Affordable and Workforce Housing Advisory Committee meetings held regularly at City Hall. HUD Certified Housing Councilors from GAP Community Development Resources held one-on-one sessions with citizens who had housing needs or issues.

### **Foreclosure Task Force**

The City's Housing Development Coordinator, GAP Community Development Resources, Williamson County Association of Realtors, and local Mortgage Lenders partnered to form the Foreclosure Task Force. This diverse group investigated ways to assist citizens who are experiencing high risk of home foreclosure.

The group recognized that a "short sale" is sometimes a viable option for the homeowner in order to avoid foreclosure. Further, matching a qualified buyer with the distressed homeowner creates a mutually beneficial situation.

However, two issues were identified as barriers or potential pitfalls to the short sale process. First, the process itself is complex and a small percentage of realtors were well versed at the short sale process. Secondly, homeowners at high risk of foreclosure are often targets for SCAMS where individuals try to exploit the homeowner's lack of knowledge.

To address the issues above, the Task Force developed and implemented a Realtor Screening Process. Through use of a questionnaire, local real estate professionals can receive an “Endorsement” of their qualifications and be referred to high risk homeowners who are seeking assistance and considering a short sale process.

#### **TNHousingSearch.org**

The City is endorsing and marketing the TNHousingSearch.org web portal sponsored by Tennessee Housing Development Agency (THDA). Marketing materials and program information are prominently on display in City Hall adjacent to the codes and permitting department.

#### **City Staff Training & Conference Participation**

- The Director of Codes Administration attended Fair Housing Matters Conference in Clarksville, TN during June 2008.
- The Housing Development Coordinator attended the Fair Housing Matters Conference in Murfreesboro, TN during April, 2009.
- The Housing Development Coordinator attended Fair Housing training/presentation by David King, Director, Office of Fair Housing and Equal Opportunity, Knoxville Field Office. (Region IV HUD Entitlement City Conference, March 2009)
- Staff continues to participate in the Fair Housing Conference.
- The Housing Coordinator has obtained Homebuyer Certification.

#### **Uniform Residential Landlord and Tenant Act**

The City of Franklin, Tennessee Fair Housing Council and GAP Community Development Resources will host training on August 18<sup>th</sup> concerning the Uniform Residential Landlord and Tenant Act. Marketing materials are currently in work to publicize the training event.

## **VI. CONCLUSIONS AND RECOMMENDATIONS**

The City of Franklin is continuing their efforts to educate the public regarding Fair Housing. During September, 2008, the City of Franklin prepared and submitted our first Analysis of Impediments. As a result of this determination, the Analysis has been revised as requested and resubmitted for approval.

Since the preparation of the first version of the AI, a new staff position was developed and funded. The Housing Development Coordinator partners with the community, staff, various committees and public and private organizations in order to serve as the City’s primary point of contact for all affordable housing development and fair housing choice initiatives and programs.

The current version of the AI was revised by the City of Franklin’s Housing Development Coordinator following review of the Fair Housing Planning Guide Book and the Fair Housing Plan: Procedures for Mapping Analysis of Impediments. Input from residents, public and private service providers and citizens knowledgeable of the community contributed significantly to other data sources for identification of the Impediments to Fair Housing Choice and the actions designed to address those Impediments.

Impediments identified and addressed by actions in the AI are as follows:

- LACK OF AFFORDABLE HOUSING CHOICE
- LACK OF AWARENESS AND UNDERSTANDING OF FAIR HOUSING LAWS
- LACK OF OUTREACH AND EDUCATION TO THE COMMUNITY CONCERNING FAIR HOUSING
- LACK OF A PLAN AND FORMAL PROCESS FOR ADDRESSING FAIR HOUSING ISSUES ON AN ONGOING BASIS

A summary of the analysis considered in determining the Impediments, as well as, specific actions developed to address each of the above Impediments, are discussed in detail in Section IV of this document.

As this document is a revised version, previously identified actions to address impediments have been successfully implemented prior to resubmission of the AI. A description of each of the Actions Implemented thus far during the Current Program Year (7/1/2008 to 6/30/2009) is discussed in Section V.

Actions Implemented and Discussed in More Detail in Section V:

- Fair Housing Choice Ordinance
- Barrier Free Construction Ordinance
- Water and Wastewater System Development and Access Fee Incentive Program Ordinance
- Affordable and Workforce Housing Round-up Ordinance & Program
- CDBG Allocation of for Fair Housing Training
- Second Annual Housing Fair
- Foreclosure Task Force
- TNHousingSearch.org
- City Staff Training & Conference Participation
- Uniform Residential Landlord and Tenant Act Training

The City of Franklin's 5 Year Plan for Housing and Community Development will expire upon next program year ending date of 6/30/2015. The Analysis of Impediments and the Consolidated Planning actions and goals will be worked in concert with the ultimate objective to continually improve the effectiveness of our collective efforts in the community to Affirmatively Further Fair Housing Choice in the City of Franklin.

Approval of the City of Franklin's Analysis of Impediment to Fair Housing Choice is recommended and requested.